

Attorney Docket No.: FMCE-P064

Remarks

Reconsideration of the above-identified application is respectfully requested.

Claims 1, 3, 6 and 7 stand rejected under 35 U.S.C. 102(b) as being anticipated by Wolff et al. (U.S. Patent No. 4,082,147). Independent claim 1 has accordingly been amended to more clearly distinguish applicant's invention from this reference.

Thus, claim 1 now requires that the multiple production outlets be connected to a generally horizontal production passage (item 12 in Figure 2 of the application), which in turn is connected to the vertical production bore. Even assuming *arguendo* that Wolff discloses two production outlets (i.e., the conduits containing the valves WV-1 and WV-2), Wolff does not disclose that these production outlets are both connected to a single, generally horizontal production passage which in turn is connected to the vertical production bore. Therefore, Wolff et al. does not anticipate claim 1.

Furthermore, claims 3, 6 and 7 depend from claim 1. Therefore, these claims are novel over Wolff et al. for the reasons stated above with respect to claim 1.

Also, claim 6 is independently novel over Wolff et al. because this patent does not disclose a horizontal Christmas tree. As is well understood by the person of ordinary skill in the art, a horizontal Christmas tree generally includes a tubing hanger which is landed in the tree and which comprises a vertical production bore that is connected to the well and a horizontal production outlet

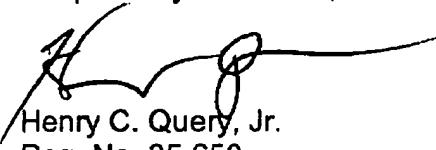
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that communicates with the production passage in the tree. The designation "horizontal" thus derives from the fact that the well fluids exit the tubing hanger horizontally through the horizontal production outlet. Since Wolff does not disclose such a tubing hanger in the christmas tree X, the Christmas tree X is not a horizontal Christmas tree. Therefore, Wolff does not anticipate claim 6.

Claims 2, 4 and 5 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Wolff alone. However, these claims depend from claim 1. Therefore, to the extent that the instant rejection is based on the Examiner's assertion that claim 1 is anticipated by Wolff, applicant submits that claims 2, 4 and 5 are patentable over Wolff for the reasons stated above.

In light of the foregoing, claims 1-13 are submitted as allowable. Favorable action is solicited.

Respectfully submitted,



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